

Message

From: Ho, Yenhung [Ho.Yenhung@epa.gov]
Sent: 2/4/2022 10:30:30 PM
To: Guest Rebecca Hollis [Clean Energy Systems] [rhollis@cleanenergysystems.com]; Guest Natalie Nowiski [Schlumberger] [NNowiski@slb.com]; Kambin, Roya [RKambin@chevron.com]; Diogo D'Oliveira [ddoliveira@slb.com]
CC: Albright, David [Albright.David@epa.gov]
Subject: list of needed updates to MCNEP application

Rebecca et al.,

Thank you for providing EPA with the MCNEP project status update last month.

When MCNEP updates your UIC Class VI permit application to incorporate the new geologic information and the location of the well, please consider changes to the permit application pieces include, but are not limited to, the following:

- Site Characterization/ geologic narrative: incorporate any new information about subsurface formations that is gained during testing at the characterization well or via the 3D seismic survey; also revise to address any localized geology near the new well location.
- Operating Conditions--Attachment A: revise as needed if any updated geologic information (e.g., new information about the fracture pressure of the confining zone) warrants changes to injection rates/pressures.
- AoR and Corrective Action--Attachment B: update to reflect the revised AoR that incorporates the new well location and any subsurface data collected via the characterization well and the 3D seismic survey. Also, identify all wells in the new AoR and their corrective action status.
- Testing and Monitoring--Attachment C: update or add monitoring well locations as needed to reflect the extent of the revised AoR. The QASP should reflect all monitoring wells or testing in the plan.
- Injection Well Plugging--Attachment D: update to address the depths of relevant formations (i.e., injection and confining zones, USDW) at the new well site.
- Post-Injection Site Care and Site Closure--Attachment E: post-injection monitoring should reflect any changes to the injection-phase monitoring; also, the alternative PISC timeframe demonstration should reflect the revised AoR delineation modeling.
- E&RR Plan--Attachment F: address risks to any additional resources and infrastructure within the revised AoR.
- Well Construction--Attachment G: update to address the depths of relevant formations at the new well site; also revise the well construction specifications per modifications that address subsidence concerns.
- Financial responsibility--Attachment H: update the cost estimates for: plugging to address the depth of the new well, any additional post-injection monitoring, E&RR to reflect all emergency response activities in the updated E&RR Plan, and any additional corrective action needs.

Please let us know if you have any questions.

Best,
Calvin

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